

REMARKS

Claims 1 and 3-6 were examined and reported in the Office Action. Claims 1 and 3-6 are rejected. Claim 7 is added. Claim 1, 4 and 5 are amended. Claims 1 and 3-7 remain. Applicant requests reconsideration of the application in view of the following remarks.

I. 35 U.S.C. §112, First Paragraph

It is asserted in the Office Action that claims 1, 3 and 4 are rejected under 35 U.S.C. §112, first paragraph for containing subject matter which was not described in the specification in such a way as to reasonably convey to one skilled in the relevant art that the inventor, at the time the application was filed, had possession of the claimed invention. Applicant notes that light bar coupling device is reference 190. Applicant has amended the specification regarding reference 190. Applicant has also amended claim 1 for clarification regarding the light bar bracket 160. Applicant's amendments overcome the 35 U.S.C. §112, first paragraph rejections.

Accordingly, withdrawal of the 35 U.S.C. §112, second paragraph rejections for claims 1, 3 and 4 are respectfully requested.

II. 35 U.S.C. §102(b)

It is asserted in the Office Action that claims 1, 3 and 4 are rejected under 35 U.S.C. §102(b) as being anticipated by U. S. Patent No. 4,504,888 issued to Rosenthal ("Rosenthal"). Applicant respectfully traverses the aforementioned rejection for the following reasons.

According to MPEP §2131,

'[a] claim is anticipated only if each and every element as set forth in the claim is found, either expressly or inherently described, in a single prior art reference.' (Verdegaal Bros. v. Union Oil Co. of California, 814 F.2d 628, 631, 2 USPQ2d 1051, 1053 (Fed. Cir. 1987)). 'The identical invention must be shown in as complete detail as is contained in the ... claim.' (Richardson v. Suzuki Motor Co., 868 F.2d 1226, 1236, 9

USPQ2d 1913, 1920 (Fed. Cir. 1989)). The elements must be arranged as required by the claim, but this is not an *ipsissimis verbis* test, *i.e.*, identity of terminology is not required. (In re Bond, 910 F.2d 831, 15 USPQ2d 1566 (Fed. Cir. 1990)).

Applicant's amended claim 1 contains the limitations of

a first and a second light fixture coupling bracket each adapted to removably couple to a frame of a light box, the first and the second light fixture coupling brackets each including a first and a second through-hole and coupled to the frame by a light bar coupling device inserted into the first through-hole of the first and the second light fixture coupling brackets, a first and a second tightening handle each coupled to a light fixture coupling bracket through the second through-hole of the first and the second light fixture coupling brackets, wherein said light bar bracket includes an attaching pin to couple to a light bar having at least one socket adapted to accept the attaching pin within the at least one socket, said plurality of light fixture coupling brackets adaptable to couple to a removably and adjustable gripping device including a gripping pin, said gripping device is rotatably adjusted around said light box, said gripping device coupled with the first and the second tightening handles and the first and the second light fixture coupling brackets, and the attaching pin is coupled to a bracket coupler that is slidably coupled in a groove in the light bar bracket.

Rosenthal discloses a diffuser light. It is asserted in the Office Action that Rosenthal discloses an attaching pin and references Fig. 2, reference 19 of Rosenthal. Fig. 2, reference 19 of Rosenthal discloses a threaded stud that fits within a spacer 24 where a wing nut 25 attaches the light to a mounting plate 12. The threaded stud of Rosenthal is not adjustably placed along the mounting plate. That is, Rosenthal's diffuser light does not teach, disclose or suggest "the attaching pin is coupled to a bracket coupler that is slidably coupled in a groove in the light bar bracket."

Therefore, since Rosenthal does not disclose, teach or suggest all of Applicant's amended claim 1 limitations, Applicant respectfully asserts that a *prima facie* rejection under 35 U.S.C. § 102(b) has not been adequately set forth relative to Rosenthal. Thus, Applicant's amended claim 1 is not anticipated by Rosenthal. Additionally, the claims

that directly or indirectly depend on claim 1, namely claims 3 and 4, are also not anticipated by Rosenthal for the same reason.

Accordingly, withdrawal of the 35 U.S.C. §102(b) rejections for claims 1, 3 and 4 are respectfully requested.

III. 35 U.S.C. § 103(a)

It is asserted in the Office Action that claims 5 and 6 are rejected in the Office Action under 35 U.S.C. § 103(a), as being unpatentable over U. S. Patent No. 6,106,125 issued to Finn et al. ("Finn") and U.S. Patent Application No. 4,504,888 issued to Rosenthal ("Rosenthal"). Applicant respectfully traverses the aforementioned rejection for the following reasons.

According to MPEP §2142

[t]o establish a prima facie case of obviousness, three basic criteria must be met. First, there must be some suggestion or motivation, either in the references themselves or in the knowledge generally available to one of ordinary skill in the art, to modify the reference or to combine reference teachings. Second, there must be a reasonable expectation of success. Finally, the prior art reference (or references when combined) must teach or suggest all the claim limitations. The teaching or suggestion to make the claimed combination and the reasonable expectation of success must both be found in the prior art, and not based on applicant's disclosure. (In re Vaeck, 947 F.2d 488, 20 USPQ2d 1438 (Fed. Cir. 1991)).

Further, according to MPEP §2143.03, "[t]o establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. (In re Royka, 490 F.2d 981, 180 USPQ 580 (CCPA 1974).” “All words in a claim must be considered in judging the patentability of that claim against the prior art.” (In re Wilson, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970), emphasis added.)

Applicant's amended claim 5 contains the limitations of

a light bar having at least one socket that attaches to an attaching pin, the light bar coupled to a light bar bracket, the attaching pin couples to the at least one socket through insertion into the at least one socket, said light bar including at least one removable gripping device, said gripping device including a gripping pin substantially centered on a rear portion of said light bar, said gripping pin is removable from said gripping device, said gripping device is removably coupled to a plurality of light fixture coupling brackets through a first and a second tightening handle, wherein said removable gripping device is removably coupled to a light box having a plurality of expansion rods coupled to a first and a second frame, and each of a plurality of light fixture coupling devices is removably coupled through the light bar and through the plurality of light fixture coupling brackets, and the attaching pin is coupled to a bracket coupler that is coupled in a groove in a light bar bracket.

Rosenthal discloses a diffuser light. Fig. 2, reference 19 of Rosenthal discloses a threaded stud that fits within a spacer 24 where a wing nut 25 attaches the light to a mounting plate 12. The threaded stud of Rosenthal is not adjustably placed along the mounting plate. Rosenthal does not teach, disclose or suggest an "attaching pin is coupled to a bracket coupler that is coupled in a groove in a light bar bracket."

Finn discloses a lighting box. It is asserted in the Office Action that Finn illustrates a light bar 14. The light bar in Finn, however, does not teach, disclose or suggest a "light bar coupled to a light bar bracket," wherein an "attaching pin is coupled to a bracket coupler that is coupled in a groove in a light bar bracket." That is, the light bar in Finn is a mounting bar where lights are mounted to the bar. The light bar in Finn uses c-clamps 90 to mount lights to the light bar 14. Applicant's light socket is more similar to a socket wrench type of coupling where Applicant's attaching pin is inserted into the socket on one side, and a groove in the light bar on the other side.

Additionally, Applicant notes that the light bar disclosed in Finn is just a bar where C-clamps are used for attaching lighting. Finn does not illustrate nor describe light fixture coupling brackets are removably coupled to a frame, especially where a light bar coupling device, or tightening handles are coupled to the light fixture coupling brackets.

Neither Finn, Rosenthal, and therefore, nor the combination of the two teach, disclose or suggest all the limitations contained in Applicant's amended claim 5 as listed above. Since neither Finn, Rosenthal, and therefore, nor the combination of the two teach, disclose or suggest all the limitations of Applicant's amended claim 5, Applicant's amended claim 5 is not obvious over Finn in view of Rosenthal since a *prima facie* case of obviousness has not been met under MPEP §2142. Additionally, the claim that directly depends from amended claim 5, namely claim 6, would also not be obvious over Finn in view of Rosenthal for the same reason.

Accordingly, withdrawal of the 35 U.S.C. § 103(a) rejections for claims 5 and 6 are respectfully requested.

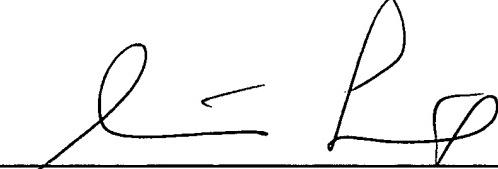
CONCLUSION

In view of the foregoing, it is submitted that claims 1, 3-6 patentably define the subject invention over the cited references of record, and are in condition for allowance and such action is earnestly solicited at the earliest possible date. If the Examiner believes a telephone conference would be useful in moving the case forward, he is encouraged to contact the undersigned at (310) 207-3800.

If necessary, the Commissioner is hereby authorized in this, concurrent and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2666 for any additional fees required under 37 C.F.R. §§1.16 or 1.17, particularly, extension of time fees.

Respectfully submitted,

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CERTIFICATE OF MAILING

I hereby certify that this correspondence is being deposited with the United States Postal Service as First Class Mail with sufficient postage in an envelope addressed to: Mail Stop Amendment, Commissioner for Patents, P. O. Box 1450, Alexandria, Virginia 22313-1450 on November 15, 2005.


Jean Svoboda